

VLADECK, WALDMAN, ELIAS & ENGELHARD, P.C.

COUNSELORS AT LAW

1501 BROADWAY

NEW YORK, N.Y. 10036

TEL 212/403-7300

FAX 212/221-3172



May 21, 2008

**BY FEDERAL EXPRESS**

Honorable Robert W. Sweet  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, New York 10007

Re: Carter v. Fordham Auto Sales, Inc.  
08 Civ. 3745 (RWS)

Dear Judge Sweet:

We represent plaintiff Curtis Carter in the above-referenced matter. On behalf of both parties, we enclose a courtesy copy of a Proposed Discovery Plan (the "Plan") pursuant to Fed. R. Civ. P. 26(f), which was filed electronically with the Court today. Unless the Court requires any further information or has any questions, the parties respectfully request that the Court so-order the Plan.

Respectfully submitted,



Kevin T. Mintzer

KTM:as

Enclosure

cc: David J. Reilly, Esq. (by fax, w/ encl.)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CURTIS CARTER,

ECF CASE

Plaintiff,

08 Civ. 3745 (RWS)

- against -

PROPOSED DISCOVERY  
PLAN PURSUANT TO  
FED. R. CIV. P. 26(f)

FORDHAM AUTO SALES, INC. d/b/a FORDHAM  
TOYOTA,

Defendant.

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Pursuant to Fed. R. Civ. P. 26(f), counsel for the parties conferred on May 20, 2008. Based upon that conference, the parties submit this Joint Discovery Plan to the Court:

1. The parties will exchange Initial Disclosures pursuant to Fed. R. Civ. P. 26(a) on or before June 20, 2008.
2. The parties will exchange Initial Interrogatories and Document Requests on or before June 20, 2008.
3. Joinder of additional parties and/or amendment of the pleadings to occur no later than July 31, 2008.
4. Depositions to be completed by October 31, 2008.
5. All discovery, including any expert discovery, to be completed by October 31, 2008.
6. Pursuant to Fed. R. Civ. P. 26(f)(3)(C), (D) & (E), the parties at this time do not anticipate any issues with respect to the disclosure of electronically stored information or claims

of privilege. Furthermore, the parties do not seek any changes in the limitations on discovery imposed by the Federal Rules of Civil Procedure or the Local Civil Rules of this Court.

Dated: New York, New York  
May 21, 2008

VLADECK, WALDMAN, ELIAS &  
ENGELHARD, P.C.

By: S/ Kevin T. Mintzer  
Kevin T. Mintzer (KM 4741)  
Attorneys for Plaintiff  
1501 Broadway, Suite 800  
New York, New York 10036  
(212) 403-7300

McELROY, DEUTSCH, MULVANEY &  
CARPENTER, LLP

By: S/ David J. Reilly  
David J. Reilly (DR 7708)  
Attorneys for Defendant  
1300 Mount Kemble Avenue  
P.O. Box 2075  
Morristown, New Jersey 07962  
(973) 993-8100

SO ORDERED:

  
  

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